

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

---

In re:	)
SOURCEWATER, INC.,	)
Debtor.	)
	Case No. 23-30960 (JPN)
	)
	Chapter 11, Subchapter V
	)

---

**WITNESS AND EXHIBIT LIST**

---

Judge:	Hon. Jeffrey P. Norman
Hearing Date:	August 1, 2023
Hearing Time:	9:30 a.m. prevailing Central Time
Party's Name:	Energy Debt Holdings LLC
Attorney's Name:	R. J. Shannon
Attorney's Phone:	(713) 714-5770
Nature of Proceeding:	<p>Hearing on:</p> <ul style="list-style-type: none"> <li>• Confirmation of the Debtor's Plan of Reorganization Pursuant to §1190 of the Bankruptcy Code</li> </ul>

Energy Debt Holdings LLC (“EDH”) hereby submits this witness and exhibit list in connection with the hearing to be held on Monday, August 1, 2023, at 9:30 a.m. (Central Standard Time) (the “Hearing”).

**WITNESSES**

EDH may call any of the following witnesses at the Hearing, whether in person or by proffer:

1. Joshua Adler;
2. John J. Griffin III;
3. Any witness called or designated by any other party; and
4. Any witnesses necessary to rebut the testimony of any witnesses called or designated by any other party.

**EXHIBITS**

EDH may offer for admission into evidence any of the following exhibits, and any exhibit designated by any other party, at the Hearing:

Ex.	Description	Offered	Objection	Admitted /Not Admitted	Disposition
1	EDH Senior Secured Credit Note				
2	EDH Security Agreement				
3	Subordination and Intercreditor Agreement				
4	Debtor's Supplemental UCC-1 Certification [ECF No. 6]				
5	Debtor's Voluntary Petition [ECF No. 1]				
6	Debtor's Notice of Filing Statement of Cash Flows, Profit and Loss Statement, and Balance Sheet for Year Ending December 31, 2022 [ECF No. 33]				
7	Debtor's Notice of Filing Statement of Cash Flows, Profit and Loss Statement, and Balance Sheet for the Period January 1, 2023 – March 17, 2023 [ECF No. 46]				
8	Debtor's Schedules and Statement of Financial Affairs [ECF No. 36]				
9	Debtor's Monthly Operating Report for March 2023 [ECF No. 81]				
10	Debtor's Monthly Operating Report for April 2023 [ECF No. 89]				
11	Debtor's Monthly Operating Report for May 31, 2023 [ECF No. 99]				
12	Sourcewater Income Projections, Ex. A to Proposed Plan [ECF No. 94-1]				
13	Liquidation Analysis, Ex. B to Plan [ECF No. 94-2]				

Ex.	Description	Offered	Objection	Admitted /Not Admitted	Disposition
14	Plan Supplement in Connection with the Debtor's Plan of Reorganization Pursuant to § 1190 of the Bankruptcy Code [ECF No. 127]				
15	Secured Promissory Note, Ex. A to DIP Financing Motion [ECF No. 39-1]				
16	Secured Promissory Note, Ex. A to DIP Financing Motion [ECF No. 39-1]				

EDH reserves the right to supplement, amend or delete any witness and exhibits prior to the Hearing. EDH also reserves the right to (a) ask the Court to take judicial notice of any document, (b) introduce exhibits previously admitted and (c) introduce any exhibit necessary or appropriate to necessary to rebut the testimony of any witnesses called or designated by any other party or an exhibit introduced or designated by any other party.

Dated: July 27, 2023

SHANNON & LEE LLP

/s/ R. J. Shannon

R. J. Shannon  
 State Bar No. 24108062  
[rshannon@shannonleellp.com](mailto:rshannon@shannonleellp.com)  
 2100 Travis Street, STE 1525  
 Houston, Texas 77002  
 Tel. (713) 714-5770

*Counsel to Energy Debt Holdings LLC*